

Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 4/25/2019 4:25:10 PM
To: Armijo, Christella A. [carmijo@cabq.gov]
CC: Dwayne Salisbury [dsalisbury@cabq.gov]; Belk, Ellen [Belk.Ellen@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]; dgates@cabq.gov
Subject: COA 2019 ANR - PM10 exceedances in 2018
Attachments: Exceptional Event Initial Notification 2016 rule updated April 16 2019.docx

Thanks for reaching out with the question. Ellen Belk is the lead staff for the Annual Network Review Plan process and she may have more to add.

I do not believe the Annual Network Review Plan process requires the city of Albuquerque to address monitor specific instances of NAAQS exceedances or violations believed to have been caused by an Exceptional Event. Normally, NAAQS exceedances at particular monitors are addressed via the Exceptional Event Initial Notification and Demonstration development and submittal process. In fact, last week Dan, Dwayne and myself coordinated by email on the topic of the 2018 PM10 exceedances. I attached some guidance of the Initial Notification process for your information. The Exceptional Event process takes time – from Initial Notification to Demonstration and EPA concurrence or non-Concurrence on AQS exclusion request flag based on Demonstration submittal. If EPA ultimately concurs on the request, the exceedance data points may be excluded from NAAQS evaluation or Design Value calculations. The 2018 exceedances at your monitor, however, are likely to remain unresolved until after the Annual Network Review Plan process is complete. I suggest for the purposes of the Annual Network Review Plan you consider the exceedances as ‘on the books’ and candidates data points which can be used for purposes of Design Value calculation for the area.

I understand that the subject 2018 PM10 exceedances are a consideration when you interpret 40 CFR 58 App D Table D-4, Minimum Requirements for PM10 Networks, during your preparation of the Annual Network Review Plan. Assuming the MSA is still in the 500,000- 1M category for population, the city operates four sites which measure NAAQS PM10, which conforms to the most stringent scenario of Table D-4. If maintaining the 2018 exceedances as ‘on the books’ for annual plan purposes causes the city to believe the area fits into the most stringent Table D-4 category, it appears the city is already meeting the minimum regulatory requirement.

If this does not resolve your question, let’s talk.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Armijo, Christella A. <carmijo@cabq.gov>
Sent: Thursday, April 25, 2019 10:11 AM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Cc: Dwayne Salisbury <dsalisbury@cabq.gov>
Subject: 2019 ANR

Hi Dorothy,

I’m working on the 2019 ANR and I have a question regarding PM 10. The data shows an exceedance in the 2018 data, but we plan to flag it as an exceptional event. How would you like me to report the data in the ANR? As no exceedances for 2018, or as 1 exceedance, but with language indicating that we believe it was due to a high wind event? Please advise.



CHRISTELLA ARMIJO

environmental scientist | environmental health department

o 505.767.5621

m 505.205.3903

cabq.gov/environmentalhealth/